

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.: 3:12-cv-30170-MAP

LISA KOSS,

Plaintiff

v.

PALMER WATER DEPARTMENT,
PALMER FIRE DISTRICT NO. 1 AND
PALMER WATER DISTRICT NO. 1,
WILLIAM COLE and CHARLES M.
CALLAHAN, III,

Defendants

**PLAINTIFF'S MOTION TO COMPEL DOCUMENTS RELATING TO SEXUAL
HARASSMENT INVESTIGATION**

NOW COMES the Plaintiff, Lisa Koss, through her Counsel, and hereby moves this Honorable Court to order the Defendants to produce to Plaintiff's Counsel all documents relating to the investigation of the Plaintiff's sexual harassment complaints. In support of this Motion, the Plaintiff files herewith the attached Memorandum.

WHEREFORE, the Plaintiff and her Counsel respectfully request that this Honorable Court compel the Defendants to produce the requested documents within ten days, or for such other relief that this Honorable Court deems reasonable and just.

Respectfully submitted,

The Plaintiff
LISA KOSS
By Her Attorneys

/s/ Michael O. Shea
MICHAEL O. SHEA, ESQ.
BBO No. 555474
Law Office of Michael O. Shea, P.C.
3 Crane Park Drive, Suite 7
Wilbraham, MA 01095
Telephone No.: (413) 596-8005
Facsimile No.: (413) 596-8095

Dated: August 22, 2013

/s/ Daniel J. O'Connell
DANIEL J. O'CONNELL, ESQ.
BBO No.: 550633
O'Connell, Plumb & MacKinnon, P.C.
75 Market Place
Springfield, MA 01103
Telephone No.: (413) 733-9111
Facsimile No.: (413) 733-9888

Dated: August 22, 2013

LOCAL RULE 7.1 AND RULE 37.1 CERTIFICATION

I, Michael O. Shea, Esq., hereby certify that I, Co-counsel for the Plaintiff, conferred with Counsel for the Defendants, Karina L. Schrengohst, Esq., pursuant to Local Rule 7.1 and Rule 37.1, via a telephone conference call on August 13, 2013, and by several emails prior thereto and thereafter, in an attempt to narrow the issues contained in the within Motion, but to no avail.

/s/ Michael O. Shea
Michael O. Shea

REQUEST FOR ORAL ARGUMENT

I, Michael O. Shea, Esq., Co-Counsel for the Plaintiff, hereby request oral argument on the subject Motion, as oral argument will likely assist the court in a ruling on the within Motion.

/s/ Michael O. Shea
Michael O. Shea

CERTIFICATE OF SERVICE

I, Michael O. Shea, Esq., Co-Counsel for the Plaintiff, hereby certify that on the 22nd day of August, 2013, I served the foregoing document by electronic filing through the ECF system to Counsel of Record for the Defendants.

/s/ Michael O. Shea
Michael O. Shea